

# **EXHIBIT J**

**CHART OF SUBPOENA REQUESTS AND RESPONSES**

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**Stonington Defendants' Requests with Circinus' Responses and Objections**

<b>Request Number</b>	<b>Request</b>	<b>Response and Objections</b>
Stonington Request 1	All communications between You and any person regarding Your or Broidy's advocacy, lobbying or consulting efforts relating to the State of Qatar or any Qatar-based entity, as well as any documents relating to such communications.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Stonington Request 2	All communications between You and any person regarding Defendants, the State of Qatar, the Kingdom of Saudi Arabia, or the alleged hacking, as well as any documents relating to such communications.	<p>Circinus objects to this Request on the ground that it seeks "all" such requested documents, which is unduly burdensome and not required by the FRCP or the Local Rules. Circinus also objects to this Request on the ground that it seeks privileged information. Circinus also objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in the case and not proportional to the needs of the case.</p> <p>Subject to the foregoing General and Specific objections, Circinus will produce non-privileged documents in its possession, custody, or control identified following a reasonable search in response to this Request concerning the hacking at issue in this case.</p>
Stonington Request 3	All documents and communications, including without limitation progress reports (whether in draft or final form), regarding Your or Broidy's advocacy, lobbying, or consulting efforts on behalf of Saudi Arabia, the UAE, or any individuals or entities—including without limitation nonprofit organizations, think tanks, and media organizations—that received funding from either country.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, that are not proportional to the needs of the case, and that are for an improper purpose. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Stonington Request 4	All documents and communications regarding public statements You or Broidy have made about	All documents and communications regarding public statements You or Broidy have made about the State of Qatar, Saudi Arabia, their governments, or their relationships with Israel.

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	the State of Qatar, Saudi Arabia, their governments, or their relationships with Israel.	
Stonington Request 5	All communications regarding Broidy's or Your own business dealings with Saudi Arabia, or any officials, agents, or representatives of that country, as well as any documents relating to such communications.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Stonington Request 6	All documents and communications regarding registration statements, if any, that You have submitted to the U.S. Department of Justice under the Foreign Agents Registration Act, related in any way to the UAE, Saudi Arabia, Israel, or any other Middle East country.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Stonington Request 7	All non-privileged communications regarding Your decision whether or not to file a registration statement with the U.S. Department of Justice under the Foreign Agents Registration Act, related in any way to the UAE, Saudi Arabia, Israel, or any other Middle East country, as well as any documents regarding such communications.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Stonington Request 8	All communications with George Nader or GS Investment Ltd., their agents, their representatives, or their attorneys, including communications between Your attorneys and Mr. Nader's or GS Investment Ltd.'s agents, representatives, or attorneys, regarding the State of Qatar, the UAE, or Saudi Arabia, as well as any documents relating to such communications.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Stonington Request 9	All communications with Broidy, his agents, or his representatives, including without limitation	Circinus objects to this Request on the ground that it seeks "all" such requested documents, which is unduly burdensome and not required by

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	lawyers at Boies Schiller Flexner LLP and Latham & Watkins, regarding Defendants, the alleged hacking, the State of Qatar, Saudi Arabia, or any individuals or entities—including without limitation nonprofit organizations, think tanks, and media organizations—that received funding from those countries, as well as any documents relating to such communications.	<p>the FRCP or the Local Rules. Circinus also objects to this Request on the ground that it seeks privileged information. Circinus also objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in the case and not proportional to the needs of the case. Circinus also objects to this Request on the ground that it seeks documents within the possession, custody, and control of parties to the case and/or third parties.</p> <p>Subject to the foregoing General and Specific objections, Circinus will produce non-privileged documents in its possession, custody, or control identified following a reasonable search in response to this Request concerning Defendants and the hacking at issue in this case.</p>
Stonington Request 10	All documents and communications regarding monetary payments or donations made or received by You or Broidy, in connection with Broidy's or Your own advocacy, lobbying, or consulting efforts relating to the State of Qatar, including without limitation monetary payments or donations made by or received from Saudi Arabia or the UAE, or any individuals or entities—including but not limited to nonprofit organizations, think tanks, and media organizations—that received funding from either country.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Stonington Request 11	All communications between You and any person regarding Broidy's non-Circinus business dealings with the UAE or Saudi Arabia, or any officials, agents, or representatives of those countries, as well as any documents relating to such communications.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.

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Stonington Request 12	All communications between You, Your agents, or representatives, and members of the press, or their staff, agents, or representatives, regarding the alleged hacking, the State of Qatar, the United Arab Emirates, the Kingdom of Saudi Arabia, or Defendants, as well as any documents relating to such communications.	<p>Circinus objects to this Request on the ground that it seeks “all” such requested documents, which is unduly burdensome and not required by the FRCP or the Local Rules. Circinus also objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in the case and not proportional to the needs of the case. Circinus also objects to this Request on the ground that responsive documents are in the possession, custody, and control of Defendants and/or third parties and/or are publicly available.</p> <p>Subject to the foregoing General and Specific objections, Circinus will produce non-privileged documents in its possession, custody, or control identified following a reasonable search in response to this Request concerning the hacking at issue in this case.</p>
Stonington Request 13	All documents or communications regarding contracts, agreements, pitches, proposals, bids, or other arrangements of value sought or entered into by Circinus regarding Defendants, the alleged hacking, the State of Qatar, the UAE, or Saudi Arabia.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in the case and not proportional to the needs of the case. Circinus further objects to this Request on the ground that it seeks “all” such requested documents, which is unduly burdensome and not required by the FRCP or the Local Rules. Circinus also objects to this Request on the ground that it seeks privileged information. Circinus also objects to this Request on the ground that contracts, agreements, etc. with the State of Qatar, the UAE, or Saudi Arabia are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and requested for an improper purpose. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request, and further states that Circinus has no contracts, agreements, etc. regarding Defendants or the hacking.
Stonington Request 14	All documents and communications relating to any financial transactions or exchanges of anything of value, whether directly or through an intermediary, between Circinus, the UAE, Saudi	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Based on the

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	Arabia, George Nader, GS Investment Ltd, or Xiemen Investments Limited.	foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Stonington Request 15	All documents and communications relating to Your receipt of moneys either directly or indirectly from the United Arab Emirates.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Stonington Request 16	All documents and communications relating to Your receipt of moneys either directly or indirectly from the Kingdom of Saudi Arabia.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Stonington Request 17	All documents and communications with Crown Prince Mohammed bin Zayed al-Nahyan of the United Arab Emirates.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Stonington Request 18	All documents and communications between You and any member of the Royal Family of the United Arab Emirates.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Stonington Request 19	All documents and communications with Yousef al-Otaiba, Ambassador of the United Arab Emirates to the United States of America.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Stonington Request 20	All documents and communications relating to the Palestinian International Terrorism Support Prevention Act of 2017, H.R. 2712, 115th Congress, 2017-2018.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Based on the

Request Number	Request	Response and Objections
		foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Stonington Request 21	All documents and communications relating to payments of money You facilitated either directly or indirectly to any sponsor of the Palestinian International Terrorism Support Prevention Act of 2017, H.R. 2712, 115th Congress, 2017-2018, or any entity affiliated with such sponsor.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Stonington Request 22	All documents and communications relating to any assistance or service You provided to any sponsor of the Palestinian International Terrorism Support Prevention Act of 2017, H.R. 2712, 115th Congress, 2017-2018 or any relative or friend of such sponsor, and whether You were compensated or not for such assistance or service.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Stonington Request 23	All documents and communications regarding payments, donations, gifts, grants, disbursements, or contributions—including without limitation contributions to PACs, Hybrid PACs, Super PACs, 501(c)(3) organizations, or 501(c)(4) organizations—received by or made by You or Broidy, or at Your or Broidy’s direction, in relation to any federal political campaign.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Stonington Request 24	All communications with President Donald Trump and/or members of President Trump’s family; White House staff; Trump presidential campaign staff; Save America PAC staff; America First Action PAC staff; Make America Great Again Action PAC staff; Make America Great Again, Again PAC staff; or Trump Administration transition team members; or the	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.



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	agents or representatives of any of the individuals or organizations identified in this Request, regarding the State of Qatar, the UAE, or Saudi Arabia, as well as any documents relating to such communications.	
Stonington Request 25	All communications with any U.S. Senator or U.S. Congressman and/or members of any Senator's or Congressman's staff regarding the State of Qatar, the UAE, or Saudi Arabia, as well as any documents relating to such communications.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Stonington Request 26	All communications with any U.S. Cabinet Members or their staff, agents, or representatives regarding the State of Qatar, the UAE, or Saudi Arabia, as well as any documents relating to such communications.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Stonington Request 27	All communications with former Congressman Ed Royce or his staff, agents, or representatives regarding the State of Qatar, the UAE, or Saudi Arabia, as well as any documents relating to such communications.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Stonington Request 28	All communications with former Congresswoman Ileana Ros-Lehtinen or her staff, agents, or representatives regarding the State of Qatar, the UAE, or Saudi Arabia, as well as any documents relating to such communications.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Stonington Request 29	All communications with any agent, official, or representative of the government of Saudi Arabia regarding the State of Qatar or the UAE, including communications between Your attorneys and any such agent, official,	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.

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	representative, or attorney of the agent, official or representative, as well as any documents relating to such communications.	
Stonington Request 30	All communications with any agent, official, or representative of the government of the UAE regarding the State of Qatar, including communications between Your attorneys and any such agent, official, representative, or attorney of the agent, official, or representative, as well as any documents relating to such communications.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Stonington Request 31	All documents and communications relating to any conferences you organized, participated in, or financed, involving the State of Qatar, the United Arab Emirates, or the Kingdom of Saudi Arabia.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Stonington Request 32	All documents and communications regarding any investigation of Yours or Broidy's activities relating to the State of Qatar, the United Arab Emirates, or the Kingdom of Saudi Arabia by any foreign state or U.S. federal, state, or other regulatory agency.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Stonington Request 33	All communications with Special Counsel Robert Mueller and his investigation team relating to the State of Qatar, the United Arab Emirates, or the Kingdom of Saudi Arabia, as well as any documents relating to such communications.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Stonington Request 34	All communications with Robin Rosenzweig, or her staff, agents, or representatives, regarding the State of Qatar, the UAE, Saudi Arabia, Defendants, and the alleged hacking, as well as any documents relating to such communications.	Circinus objects to this Request on the ground that it seeks "all" such requested documents, which is unduly burdensome and not required by the FRCP or the Local Rules. Circinus also objects to this Request on the ground that it seeks privileged information. Circinus also objects to this Request on the ground that it seeks documents that are irrelevant to

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		<p>the claims and defenses in the case and not proportional to the needs of the case.</p> <p>Subject to the foregoing General and Specific objections, Circinus will produce non-privileged documents in its possession, custody, or control identified following a reasonable search in response to this Request concerning the hacking at issue in this case, to the extent any exist.</p>
Stonington Request 35	All communications with Erica Hilliard, or her staff, agents, or representatives, regarding the State of Qatar, the UAE, Saudi Arabia, Defendants, or the alleged hacking, as well as any documents relating to such communications.	<p>Circinus objects to this Request on the ground that it seeks “all” such requested documents, which is unduly burdensome and not required by the FRCP or the Local Rules. Circinus also objects to this Request on the ground that it seeks privileged information. Circinus also objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in the case and not proportional to the needs of the case.</p> <p>Subject to the foregoing General and Specific objections, Circinus will produce non-privileged documents in its possession, custody, or control identified following a reasonable search in response to this Request concerning the hacking at issue in this case, to the extent any exist.</p>
Stonington Request 36	All bank statements for accounts belonging to You between January 1, 2016, and the present.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and that it is improper and harassing. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.

**Howard's Requests with Circinus' Responses and Objections**

<b>Request Number</b>	<b>Request</b>	<b>Response and Objections</b>
Howard Request 1	All documents and communications (whether in draft or final form) regarding Your or Broidy's advocacy, lobbying, or consulting (or proposed advocacy, lobbying, or consulting) on behalf of: (a) Angola; or (b) any individuals or entities (including without limitation nonprofit organizations, think tanks, and media organizations) that received funding from Angola.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Howard Request 2	All documents and communications regarding Your business dealings with: (a) Angola, or (b) any officials, agents, or representatives of Angola.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Howard Request 3	All documents and communications regarding Broidy's business dealings with: (a) Angola, or (b) any officials, agents, or representatives of Angola.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Howard Request 4	All documents and communications regarding registration statements that You have submitted to the U.S. Department of Justice under the Foreign Agents Registration Act, related to Angola.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.

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Howard Request 5	All non-privileged documents and communications regarding Your decision whether or not to file a registration statement with the U.S. Department of Justice under the Foreign Agents Registration Act, related in any way to Angola.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Howard Request 6	All documents and communications relating to any financial transactions or exchanges of anything of value, whether directly or through an intermediary, between Circinus and Angola.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Howard Request 7	All documents and communications relating to Your receipt of anything of value, either directly or indirectly, from Angola.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Howard Request 8	All documents and communications regarding monetary payments or donations made by or received by You or Broidy from: (a) Angola; or (b) any individuals or entities (including without limitation nonprofit organizations, think tanks, and media organizations) that received funding from Angola.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Howard Request 9	All documents and communications regarding contracts, agreements, pitches, proposals, bids, or other similar arrangements sought or entered into by Circinus regarding Angola.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged information.

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		Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Howard Request 10	All communications with Broidy, his agents, or his representatives, including without limitation lawyers at Boies Schiller Flexner LLP and Latham & Watkins, regarding: (a) Angola; or (b) any individuals or entities (including without limitation nonprofit organizations, think tanks, and media organizations) that received funding from Angola, as well as any documents relating to such communications.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request on the ground that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Howard Request 11	All documents and communications regarding any meetings discussed, proposed, planned, arranged, or conducted between or among: (a) Angola, or any official, agent, or representative of that country, including without limitation João Manuel Gonçalves Lourenço and André de Oliveira João Sango; and (b) any U.S. Senator, U.S. Congressman, member of the Trump Administration (including President Donald Trump), member of President Trump's family, Trump presidential campaign staff member, Save America PAC staff member, America First Action PAC staff member, Make America Great Again Action PAC staff member, Make America Great Again, Again PAC staff member, or Trump Administration transition team member.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request on the ground that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Howard Request 12	All documents and communications regarding efforts by Broidy to obtain invitations to President Trump's inauguration for any official, agent, or	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also

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	representative of Angola, including without limitation João Manuel Gonçalves Lourenço and André de Oliveira João Sango.	objects to this Request to the extent that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Howard Request 13	All communications with President Donald Trump and/or members of President Trump's family; White House staff; Trump presidential campaign staff; Save America PAC staff; America First Action PAC staff; Make America Great Again Action PAC staff; Make America Great Again, Again PAC staff; or Trump Administration transition team members; or the agents or representatives of any of the individuals or organizations identified in this Request, regarding Angola, as well as any documents relating to such communications.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Howard Request 14	All communications with any U.S. Senator or U.S. Congressman and/or members of any Senator's or Congressman's staff regarding Angola, as well as any documents relating to such communications.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Howard Request 15	All communications with any U.S. Cabinet Members or their staff, agents, or representatives regarding Angola, as well as any documents relating to such communications.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Howard Request 16	All communications with Senator Tom Cotton or his staff, agents, or representatives regarding	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also



<b>Request Number</b>	<b>Request</b>	<b>Response and Objections</b>
	Angola, as well as any documents relating to such communications.	objects to this Request to the extent that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Howard Request 17	All communications with Senator Ron Johnson or his staff, agents, or representatives regarding Angola, as well as any documents relating to such communications.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Howard Request 18	All communications with former Congressman Ed Royce or his staff, agents, or representatives regarding Angola, as well as any documents relating to such communications.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Howard Request 19	All communications with former Congresswoman Ileana Ros-Lehtinen or her staff, agents, or representatives regarding Angola, as well as any documents relating to such communications.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Howard Request 20	All documents and communications that refer or relate to lobbying or advocacy activities concerning Grupo Simples Oil.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Howard Request 21	All documents and communications (whether in draft or final form) regarding Your or Broidy's advocacy, lobbying, or consulting (or proposed	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also



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	advocacy, lobbying, or consulting) on behalf of: (a) Morocco, Romania, Malaysia, Nigeria, the Republic of the Congo, the Republic of Tunisia, or the Kurdistan Regional Government; or (b) any individuals or entities (including without limitation nonprofit organizations, think tanks, and media organizations) that received funding from Morocco, Romania, Malaysia, Nigeria, the Republic of the Congo, the Republic of Tunisia, or the Kurdistan Regional Government.	objects to this Request to the extent that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Howard Request 22	All documents and communications regarding Your business dealings with: (a) Morocco, Romania, Malaysia, Nigeria, the Republic of the Congo, the Republic of Tunisia, or the Kurdistan Regional Government, or (b) any officials, agents, or representatives of Morocco, Romania, Malaysia, Nigeria, the Republic of the Congo, the Republic of Tunisia, or the Kurdistan Regional Government.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Howard Request 23	All documents and communications regarding Broidy's business dealings with: (a) Morocco, Romania, Malaysia, Nigeria, the Republic of the Congo, the Republic of Tunisia, or the Kurdistan Regional Government, or (b) any officials, agents, or representatives of Morocco, Romania, Malaysia, Nigeria, the Republic of the Congo, the Republic of Tunisia, or the Kurdistan Regional Government.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Howard Request 24	All documents and communications regarding registration statements that You have submitted	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional

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	to the U.S. Department of Justice under the Foreign Agents Registration Act, related to Morocco, Romania, Malaysia, Nigeria, the Republic of the Congo, the Republic of Tunisia, or the Kurdistan Regional Government.	to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Howard Request 25	All non-privileged documents and communications regarding Your decision whether or not to file a registration statement with the U.S. Department of Justice under the Foreign Agents Registration Act, related in any way to Morocco, Romania, Malaysia, Nigeria, the Republic of the Congo, the Republic of Tunisia, or the Kurdistan Regional Government.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Howard Request 26	All documents and communications relating to any financial transactions or exchanges of anything of value, whether directly or through an intermediary, between Circinus and Morocco, Romania, Malaysia, Nigeria, the Republic of the Congo, the Republic of Tunisia, or the Kurdistan Regional Government.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Howard Request 27	All documents and communications relating to Your receipt of anything of value, either directly or indirectly, from Morocco, Romania, Malaysia, Nigeria, the Republic of the Congo, the Republic of Tunisia, or the Kurdistan Regional Government.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Howard Request 28	All documents and communications regarding monetary payments or donations made by or received by You or Broidy from: (a) Morocco, Romania, Malaysia, Nigeria, the Republic of the	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged information.

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	Congo, the Republic of Tunisia, or the Kurdistan Regional Government; or (b) any individuals or entities (including without limitation nonprofit organizations, think tanks, and media organizations) that received funding from Morocco, Romania, Malaysia, Nigeria, the Republic of the Congo, the Republic of Tunisia, or the Kurdistan Regional Government.	Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Howard Request 29	All documents and communications regarding contracts, agreements, pitches, proposals, bids, or other similar arrangements sought or entered into by Circinus regarding Morocco, Romania, Malaysia, Nigeria, the Republic of the Congo, the Republic of Tunisia, or the Kurdistan Regional Government.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Howard Request 30	All communications with Broidy, his agents, or his representatives, including without limitation lawyers at Boies Schiller Flexner LLP and Latham & Watkins, regarding: (a) Morocco, Romania, Malaysia, Nigeria, the Republic of the Congo, the Republic of Tunisia, or the Kurdistan Regional Government; or (b) any individuals or entities (including without limitation nonprofit organizations, think tanks, and media organizations) that received funding from Morocco, Romania, Malaysia, Nigeria, the Republic of the Congo, the Republic of Tunisia, or the Kurdistan Regional Government, as well as any documents relating to such communications.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request on the ground that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.

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Howard Request 31	All documents and communications regarding any meetings discussed, proposed, planned, arranged, or conducted between or among: (a) Morocco, Romania, Malaysia, Nigeria, the Republic of the Congo, the Republic of Tunisia, or the Kurdistan Regional Government, or any of their officials, agents, or representatives; and (b) any U.S. Senator, U.S. Congressman, member of the Trump Administration (including President Donald Trump), member of President Trump's family, Trump presidential campaign staff member, Save America PAC staff member, America First Action PAC staff member, Make America Great Again Action PAC staff member, Make America Great Again, Again PAC staff member, or Trump Administration transition team member.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Howard Request 32	All communications with President Donald Trump and/or members of President Trump's family; White House staff; Trump presidential campaign staff; Save America PAC staff; America First Action PAC staff; Make America Great Again Action PAC staff; Make America Great Again, Again PAC staff; or Trump Administration transition team members; or the agents or representatives of any of the individuals or organizations identified in this Request, regarding Morocco, Romania, Malaysia, Nigeria, the Republic of the Congo, the Republic of Tunisia, or the Kurdistan Regional Government,	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.

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	as well as any documents relating to such communications.	
Howard Request 33	All communications with any U.S. Senator or U.S. Congressman and/or members of any Senator's or Congressman's staff regarding Morocco, Romania, Malaysia, Nigeria, the Republic of the Congo, the Republic of Tunisia, or the Kurdistan Regional Government, as well as any documents relating to such communications.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.
Howard Request 34	All communications with any U.S. Cabinet Members or their staff, agents, or representatives regarding Morocco, Romania, Malaysia, Nigeria, the Republic of the Congo, the Republic of Tunisia, or the Kurdistan Regional Government, as well as any documents relating to such communications.	Circinus objects to this Request on the ground that it seeks documents that are irrelevant to the claims and defenses in this case, not proportional to the needs of the case, and for an improper purpose. Circinus also objects to this Request to the extent that it seeks privileged information. Based on the foregoing General and Specific objections, Circinus will not produce documents in response to this Request.